

UNITED STATES DISTRICT COURT FILED
DISTRICT OF MASSACHUSETTS CLERKS OFFICE

2011 MAY 27 A 9:26

UNITED STATES OF AMERICA)	UNITED STATES DISTRICT COURT DISTRICT OF MASS.
v.)	
1. JOHN WILLIS)	CRIMINAL NO. 11-cr-10212-JLT
a/k/a "Bac Guai John")	
2. BRANT WELTY)	
3. PETER MELENDEZ a/k/a "Shrek")	
4. AIBUN ENG)	
5. BRIAN BOWES)	
6. KEVIN BARANOWSKI)	
7. MICHAEL CLEMENTE)	
a/k/a "Ricky Martin")	
8. MICHAEL SHAW)	
9. MARK THOMPSON)	
10. STEVEN LE a/k/a "Little Stevie")	
11. VINCENT ALBERICO)	
12. BRIDGET WELTY)	
13. ANEVAY DUFFY a/k/a "Homegirl")	
Defendants.)	

MOTION TO IMPOUND

The United States, by its undersigned counsel, hereby moves to impound this motion and the United States' Ex Parte Application for Post-Indictment Restraining Order, Memorandum in Support of Ex Parte Application for Post-Indictment Restraining Order, proposed Restraining Order, and Application and Proposed Order to Maintain Property in Custody for Criminal Forfeiture, and any orders issued by the Court to these applications, until further order of this Court. The requested Restraining Order and Order to Maintain Property in Custody for Criminal Forfeiture are designed to preserve the status quo with respect to certain assets identified as forfeitable in the Indictment, which is presently under seal. The United States requests that these

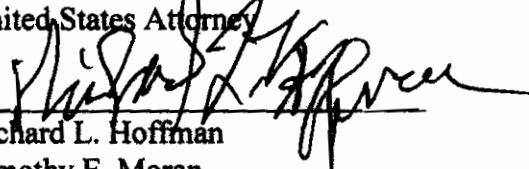
filings be impounded until the Court has determined whether to issue the requested orders, and thereafter until any restraining order issued by the Court can be served on the defendants.

The requested impoundment is intended to reduce the risk that the defendants may try to encumber, move, or hide the assets once that they learn that the United States is seeking to restrain them.

The requested impoundment is not intended to prevent service of the Restraining Order, once it has been issued by the Court, upon the defendants and their counsel, and upon others who may be subject to the Order.

WHEREFORE, the United States requests that this Court impound this motion and the United States' Ex Parte Application for Post-Indictment Restraining Order, Memorandum in Support of Ex Parte Application for Post-Indictment Restraining Order, proposed Restraining Order, and Application and Proposed Order to Maintain Property in Custody for Criminal Forfeiture, and any orders issued by the Court pursuant to these applications, until further order of this Court; and further requests that, pursuant to General Order 06-05, the United States Attorney, through undersigned counsel, be provided copies of all sealed documents which the United States has filed in this matter.

Respectfully submitted,
CARMEN M. ORTIZ
United States Attorney

By: 
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Dated: May 27, 2011